From: <u>Dan Peacock</u>
To: <u>Russell Wasem</u>

Cc: John Hebert; Laura Parsons; Gene Benbow; Jennifer Gaines; Bill Jacobs; Scott Garrison

Subject: Re: Fw: Rodenticides, Bait Station Currently Required Text

Date: 10/25/2011 09:01 AM

Rus,

Using John's list as a start and after reviewing a range of approved bait station labels, we are currently requiring the following information on bait station labels:

- 1. product name
- 2. reg. number
- 3. required text for the specific tier level that also appears on Front Panel of Outer Label per RMD. [We do not mention a specific tier number.]
- 4. active ingredient statement
- 5. Signal word
- 6. referral to full labeling
- 7. "Do not allow children or pets to play with the bait stations" (Tier 1, 2, and 3). or "Keep Out of Reach of Children" (Tier 4)
- 8. Net weight of block
- 9. "This bait station can only be refilled with the block bait sold with this station. [refillable stations only]

Note: Registrants may also put other text on label, such as "Batch Code".

Thank You,

Daniel B. Peacock, Biologist

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E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

▼ Russell Wasem---10/25/2011 08:00:41 AM---Is there guidance somewhere for what must be on a bait station's label? Rusty

From: Russell Wasem/DC/USEPA/US

To: Dan Peacock/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA

Cc: Laura Parsons/DC/USEPA/US@EPA

Date: 10/25/2011 08:00 AM Subject: Fw: Rodenticides

Is there guidance somewhere for what must be on a bait station's label?

Rusty		
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---- Forwarded by Russell Wasem/DC/USEPA/US on 10/25/2011 07:58 AM -----

From: Bob Stoddard
bob@envirosafeipm.com>
To: Russell Wasem/DC/USEPA/US@EPA

Date: 10/24/2011 08:21 PM Subject: Re: Rodenticides

Just trying to see if there is specific requirement for what labeling should be on a protecta rtu station once it is installed. Is the printing that comes on the rtu sufficient or is it required to have additional information? According to the rodenticide label it just states it must be placed in childproof station. Reading label requirement it appears that the protecta rtu meets this requirement. Thanks for your help. Bob Sent from my iPhone On Oct 24, 2011, at 8:04 PM, Wasem.Russell@epamail.epa.gov wrote: > Good Evening Bob, > Are you inquiring about whether an abbreviated label can be placed on > bait stations or are you looking for the protocols for demonstrating > tamper resistance of the bait station? If you are looking for the > protocols, please see the end of the Risk Mitigation Decision for Ten > Rodenticides (attached). Please let me know if you are inquiring about > an abbreviated label or something else. > (See attached file: Risk Mitigation Decision.pdf) > Regards, > Rusty_ > Rusty Wasem / Chemical Review Manager > Risk Management & Implementation Branch 1* > Pesticide Re-evaluation Division* / Office of Pesticide Programs > 703 / 305 6979 > From: Bob Stoddard <bob@envirosafeipm.com> Russell Wasem/DC/USEPA/US@EPA 10/24/2011 01:23 PM > Date: > Subject: Rodenticides > Dear Sir, > Can you please give me the specific legal requirements for labeling of a